

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year: 2007

Name of company covered by this certification: Legacy Long Distance International, Inc.

Form 499 Filer ID: 817998

Name of signatory: Curtis A. Brown

Title of signatory: President and CEO

I, Curtis A. Brown, certify and state that:

1. I am the President and CEO of Legacy Long Distance International, Inc. ("Legacy") and, acting as an agent of the company, I have personal knowledge of Legacy's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Legacy's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

  
\_\_\_\_\_  
Curtis A. Brown  
President and CEO

  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Legacy Long Distance International, Inc.**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Legacy Long Distance International, Inc. ("Legacy") operates solely as an operator service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes. Legacy does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Legacy has trained its personnel not to use CPNI for marketing purposes. Should Legacy elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Legacy has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Although Legacy never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, it still has procedures in place to track these instances, and notify the appropriate agencies, should they occur. Legacy has processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Legacy personnel have access to the database. It is not accessible by anyone outside the company.

When a customer calls to discuss their account, requesting access to CPNI, the company requires verification of at least three (3) identifying pieces of information to ensure the company is discussing the account with an authorized individual.